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Counsel to Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:) Case No. 08-35653 (KRH)
)
CIRCUIT CITY STORES, INC., et al., ¹) Chapter 11
)
Debtors.) (Jointly Administered)
)

NOTICE OF MOTIONS AND EXPEDITED HEARING REQUEST

Alfred H. Siegel, as Trustee, and not individually but solely in his capacity as the liquidating trustee (in such capacity, the “**Trustee**”) of the Circuit City Stores, Inc. Liquidating Trust (the “**Trust**”) created under the *Modified Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Unsecured Creditors Holding General Unsecured Claims* [Docket No. 8252, Exhibit A], by counsel, has filed the *Motion of the Circuit City Stores, Inc. Liquidating Trust to Enforce Terms of Confirmed Plan, for Protection from Foreign Subpoenas, and for Order to Show Cause*

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identifications numbers, are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512).

as to Why Stiles Ewing Powers PC, Michael S. Ewing, Esquire, Mollie C. Barton, Esquire, and David G. Fose Should Not Be Held in Contempt (the “**Motion**”).

The Trustee has also filed the *Motion to Expedite Hearing on Trustee’s Motion* (the “**Motion to Expedite**”). Copies of the Motion and the Motion to Expedite are being served herewith.

PLEASE TAKE FURTHER NOTICE THAT the Court will entertain the Motion to Expedite, and if granted, the Motion, on December 12, 2019, at 9:30 a.m. (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219. Any party desiring to object or otherwise be heard with respect to the same shall also appear and be heard at such time.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Dated: December 11, 2019

Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust

/s/ Lynn L. Tavenner

Lynn L. Tavenner (VA Bar No. 30083)

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-and-

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*Counsel to Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust*

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court, I certify that on this 11th day of December 2019,
a true copy of the foregoing Notice was sent electronically to:

Robert B. Van Arsdale, Esquire
Office of the United States Trustee
701 East Broad Street, Suite 4304
Richmond, Virginia 23219-1885
Robert.B.Van.Arsdale@usdoj.gov

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And all other parties receiving ECF notices in these Cases.

/s/ Lynn L. Tavenner

Lynn L. Tavenner, Counsel to Alfred H. Siegel, as Trustee
of the Circuit City Stores, Inc. Liquidating Trust